

Exhibit 1

Golden Boy Promotions, LLC v.
Alan Haymon, Case No. 2:15-cv-
03378-JFW-MRW (C.D. Cal. Jan.
6, 2017), ECF No. 322-13

Exhibit 2

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GOLDEN BOY PROMOTIONS, LLC,
GOLDEN BOY PROMOTIONS, INC.
And BERNARD HOPKINS,

Plaintiffs,

v.

ALAN HAYMON, ALAN HAYMON
DEVELOPMENT, INC., HAYMON
HOLDINGS, LLC, HAYMON
SPORTS, LLC, HAYMON BOXING
MANAGEMENT, HAYMON
BOXING LLC, and RYAN
CALDWELL,

Defendants.

Expert Report of
Gene Deetz, CPA/ABV, ASA, CFF
September 6, 2016



Expert Report of Gene Deetz, September 6, 2016

35. In Exhibits 1 and 3, I present my period-over-period analyses from 2014 through June 30, 2016, including the TV revenues and related events, as well as the boxers in these events, noting boxers of championship caliber. The analyses summarized in this exhibit show declines in Golden Boy's TV revenue, total revenue, and income from boxing operations, consistent with the anticompetitive impact of Haymon's business practices.¹⁹
36. In Appendix V, I have done a separate analysis of Golden Boy's contracts with broadcast networks. That analysis reveals that as Haymon began signing contracts with network broadcasters, Golden Boy's network contracts were not renewed on terms previously acceptable to the networks.²⁰
37. The continuous and dramatic decline of Golden Boy's on-air events and revenues is occurring at the same time as Haymon enters into the aforementioned exclusivity clauses and makes the related cash payments to the various broadcast networks. *See Exhibit 1 and Appendix IV.*
38. The number of broadcast events and their associated revenues declined in 2015 and 2016, when compared to 2014, as presented in Exhibit 1. As I stated above, the relationship between Golden Boy and the broadcast media (HBO, Showtime, FOX, among others), and Golden Boy's ability to promote successful events requires, among other things, championship caliber boxers²¹ and network timeslot availability.²²
39. Appendices IV and V reflect both the Haymon and Golden Boy media contracts during 2014, 2015, and through June 30, 2016. These appendices demonstrate both the decrease in Golden Boy's access to broadcast media for potential promotion of championship caliber events and the results of Haymon's significant investment in network and cable broadcast timeslots.
40. Consistent with the decline in TV Revenue is a decline in both the number of championship caliber boxing events and the number of Golden Boy promoted championship caliber boxers. *See Exhibit 1.*

¹⁹ See ¶13

²⁰ See Appendices IV and V.

²¹ As defined in the Kneuper Report, the base criteria for championship caliber boxers are those with a US based manager or promoter, as well as a television appearance within the preceding eighteen months and a current period top ten ranking in any of the fourteen weight classes, additionally including any former televised world champions within the last eighteen months.

²² The Shaw Report at pages 5 and 10 describes the promoters' requirement for both product and platform.

HIGHLY CONFIDENTIAL

CONFIDENTIAL

EXHIBIT 3
Analysis of Revenues and Expenses on an Event-by-Event, Boxer-by-Boxer Basis

2014 Metrics	TV Revenue	Ticket Sales	Merchandise Royalty	Sponsorship Revenue	Co-Promotion Revenue Share	Other Revenue	Total Revenue	Fighter COGS	Other Expenses	Income from Boxing Operations
--------------	------------	--------------	---------------------	---------------------	----------------------------	---------------	---------------	--------------	----------------	-------------------------------

Not under contract - championship caliber	18,540,738	8,468,935	17,506	465,028	587,880	25,480,058	16,650,987	-9,334,761	3,404,349	
Not under contract - not championship caliber	46,182,928	20,833,965	57,319	2,039,902	894,340	70,008,454	46,133,051	22,000,313	1,875,089	
Under contract - championship caliber	28,972,751	8,582,634	16,413	855,513	211,525	38,638,836	24,827,789	9,383,695	4,427,352	
Under contract - not championship caliber	2,387,256	254,667	306	636,279	42,951	3,321,409	1,732,290	1,556,056	23,063	
Total 2014	96,083,673	38,140,201	91,545	4,396,672	-	1,736,696	140,448,787	89,344,118	42,274,826	8,829,843

2015 Metrics	TV Revenue	Ticket Sales	Merchandise Royalty	Sponsorship Revenue	Co-Promotion Revenue Share	Other Revenue	Total Revenue	Fighter COGS	Other Expenses	Income from Boxing Operations
--------------	------------	--------------	---------------------	---------------------	----------------------------	---------------	---------------	--------------	----------------	-------------------------------

Not under contract - championship caliber	1,155,832	-	-	-	-	(786,014)	369,819	46,580	5,432	317,807
Not under contract - not championship caliber	2,070,179	12,286,869	2,179	770,673	25,200	(139,584)	4,294,684	2,896,388	1,872,290	(473,994)
Under contract - championship caliber	23,067,055	11,208,612	70,743	1,475,715	1,973,547	1,520,128	39,315,798	24,723,222	9,221,395	5,371,180
Under contract - not championship caliber	1,122,510	426,882	361	782,595	12,748	(1,557)	2,343,540	1,197,983	1,669,363	(523,806)
Total 2015	27,415,576	12,922,363	73,282	3,028,983	2,011,495	872,140	46,323,840	28,864,172	12,768,480	4,691,187

2016 Metrics	TV Revenue	Ticket Sales	Merchandise Royalty	Sponsorship Revenue	Co-Promotion Revenue Share	Other Revenue	Total Revenue	Fighter COGS	Other Expenses	Income from Boxing Operations
--------------	------------	--------------	---------------------	---------------------	----------------------------	---------------	---------------	--------------	----------------	-------------------------------

Not under contract - championship caliber	2,552,411	927,047	6,508	150,363	-	-	3,636,328	2,050,000	1,211,661	374,667
Not under contract - not championship caliber	600,787	391,362	1,676	361,218	-	-	1,355,042	902,135	788,244	(335,337)
Under contract - championship caliber	19,000,689	6,664,961	49,762	1,214,355	-	-	26,929,767	14,711,458	9,087,663	3,130,645
Under contract - not championship caliber	191,508	230,493	1,315	260,064	-	-	683,381	542,630	510,097	(369,347)
Total 2016	22,345,395	8,213,863	59,260	1,986,000	-	-	32,694,518	18,206,224	11,597,665	2,800,629

Sources:

GPB008103

GPB008105

GPB008107

GPB016225

GPB016257

GPB016300

Rankings from <http://www.ibfusbaregistration.com/>

Rankings from <http://www.wbboxing.com/>

Rankings from <http://wbcboxing.com/>

Rankings from <http://www.wbboxing.com/>

Rankings from <http://www.fightnews.com/>

HIGHLY CONFIDENTIAL

3

EXHIBIT B

128